## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LYNNE PLAINTIFF,

Plaintiff,

Case No. 22-cv-02435 (LLS)(SN)

-against-

TRACY DEEBS-ELKENANEY, et al.

Defendants.

## PLAINTIFF'S NOTICE OF MOTION FOR CLARIFICATION, OR IN THE ALTERNATIVE, MOTION FOR RECONSIDERATION

TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiff, Lynne Freeman, by her undersigned attorneys, upon the accompanying Memorandum of Law, respectfully moves this Court before the Honorable Louis L. Stanton, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 21C, New York, New York 10007, for clarification, or in the alternative, for reconsideration of its February 27, 2023 Order (ECF No. 141) and September 16, 2022 Order (ECF No. 105).

PLEASE TAKE FURTHER NOTICE that Plaintiff respectfully requests oral argument if this motion is opposed.

Respectfully submitted,

Dated: March 7, 2023 By: /s/ Scott Alan Burroughs

Scott Alan Burroughs, Esq. Laura M. Zaharia, Esq.

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Counsel for Plaintiff